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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 OAKLAND DIVISION

15 AFFINITY CREDIT UNION, GREENSTATE
16 CREDIT UNION, and CONSUMERS CO-OP
17 CREDIT UNION,

18 Plaintiff,

19 v.

20 APPLE INC., a California corporation,

21 Defendant.

Case No. 4:22-CV-04174-JSW

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE THE
DEADLINE TO TAKE THE
DEPOSITION OF NON-PARTY
GOOGLE LLC AND TO BRING
ANY MOTION TO COMPEL
RELATED TO THE DEPOSITION
OF NON-PARTY GOOGLE LLC**

JUDGE: The Honorable Jeffrey S.
White

STIPULATION

Pursuant to Local Rule 6-2, Plaintiffs Affinity Credit Union, Greenstate Credit Union, and Consumers Credit Union (“Plaintiffs”) and Defendant Apple Inc. (“Apple”) (collectively, the “Parties”), by and through their respective attorneys of record, hereby stipulate as follows:

WHEREAS, on May 13, 2025, the Court entered an order setting October 15, 2025, as the fact discovery deadline (ECF 136);

WHEREAS, pursuant to Local Rule 37-3, the deadline to bring any motion to compel related to fact discovery is currently October 22, 2025;

WHEREAS, Plaintiffs served a Rule 45 and 30(b)(6) deposition notice on non-party Google LLC (“Google”) on June 9, 2025;

WHEREAS, Plaintiffs served an amended Rule 45 and 30(b)(6) deposition notice on Google on July 3, 2025;

WHEREAS, Apple served a Rule 45 and Rule 30(b)(6) deposition notice on Google on July 9, 2025;

WHEREAS, Apple served an amended Rule 45 and Rule 30(b)(6) deposition notice on Google on August 8, 2025;

WHEREAS, Apple served an amended Rule 45 and Rule 30(b)(6) deposition notice on Google on September 4, 2025;

WHEREAS, counsel for the Parties and Google have engaged in good faith meet and confer efforts regarding the topics for the deposition;

WHEREAS, the Court previously entered an order continuing the deadline for the Google deposition until October 31, 2025, and the deadline to bring a motion to compel until two weeks after the completion of the deposition (ECF No. 238);

WHEREAS, counsel for the Parties and for Google have continued to engage in good faith meet and confer efforts regarding the topics for the deposition and to determine a suitable date for the deposition in light of the availability of counsel and the Rule 30(b)(6) witness;

1 WHEREAS, counsel for Plaintiffs and Apple have agreed to continue the deposition
2 deadline as to Google until November 21, 2025, and the deadline to bring any motion to compel
3 as to the Google deposition until December 12, 2025;

4 WHEREAS, continuing the deadlines to take the Google deposition and to file a motion
5 to compel as to that deposition will not affect other dates currently scheduled in this matter;

6 WHEREAS the parties have previously stipulated to the following time modifications: to
7 extend Apple's time to respond to the complaint (ECF No. 15); to set a briefing scheduling for
8 Apple's motion to dismiss the amended complaint (ECF No. 42); to extend Apple's time to
9 answer the amended complaint (ECF No. 65); to amend the case schedule (ECF No. 79); to
10 modify the case schedule (ECF No. 136); to extend Google's and Plaintiffs' time to respond to
11 prior Apple administrative motions to seal (ECF Nos. 158 & 175); to modify the hearing date for
12 Plaintiffs' motion for class certification (ECF No. 194); to extend the deadline to depose Google
13 and the deadline to bring a motion to compel as to the Google deposition (ECF No. 238); and to
14 extend the deadline to file motions to compel related to fact discovery (ECF No. 282).

15 The Parties hereby stipulate that the date for Plaintiffs and Apple to take the deposition of
16 Google is continued until November 21, 2025, and the deadline to bring any motion to compel as
17 to that deposition is continued until December 12, 2025.

18 Dated: October 24, 2025

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Attorneys for Defendant Apple Inc.

Dated: October 24, 2025

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By: /s/ Ben M. Harrington

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Attorneys for Plaintiffs and the Proposed Class

[PROPOSED] ORDER

Having considered the Parties' Stipulation, it is hereby Ordered that:

The deadline for Plaintiffs and Apple to complete the deposition of Google is continued until November 21, 2025, and the deadline to bring any motion to compel as to that deposition is continued until December 12, 2025.

Dated:

By: _____
THE HONORABLE JEFFREY S. WHITE
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2025, I caused a copy of the foregoing to be filed electronically with the Clerk of the Court via the Court's CM/ECF electronic filing system, which will send a notification to all counsel of record.


David M. Goldstein

SIGNATURE ATTESTATION

I am the CM/ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order to Continue the Deadline to Take the Deposition of Google LLC. I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

DATED: October 24, 2025

FARMER BROWNSTEIN JAEGER
GOLDSTEIN KLEIN & SIEGEL LLP

By: 
David M. Goldstein